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Via: ECF

August 18, 2017

Hon. Carol B. Amon
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: USA v. Jiyao Jiang et al 1:15-CR-00628

Dear Judge Amon:

I am writing to request that the Court expand, nunc pro tunc, the hours authorized for investigative services of Peter Smith LLC from 15 to 30. Mr. Smith's firm provided us investigative services during my representation of Mr. Jiang. The Court has already approved payment for 15 hours of investigative services at my request but in fact Mr. Smith and his firm expended in excess of 30 hours (although we are requesting payment for no more than a total of 30 hours).

As reflected in his invoice Mr. Smith and his associate, Tom Brennan (a retired NYPD Lieutenant), diligently pursued our investigation pursuant to my direction. I was in regular contact with Mr. Smith regarding his progress, which principally concerned investigating the background of the complaining witness, seeking to interview him and his wife, and conducting investigation and interviews to corroborate the allegedly unpaid loan that was an important factual component of the case. The investigation was a complex one, which was further complicated by the complainant's location (New Rochelle), the refusal of his associates to cooperate with us and the lack of English proficiency of certain of the persons being interviewed and/or investigated. Mr. Smith—who is also a practicing attorney – and Mr. Brennan worked diligently and their services were invaluable. I have previously used Mr. Smith's investigative services and would readily do so again. For all these reasons, I respectfully request that the Court authorize payment to Mr. Smith for an additional 15 hours (or a total of 30 hours).

Thank you for considering this request.

Respectfully,


Richard Levitt